

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re: Julia Gekhter) Chapter 13
)
) No. 20-19755
)
Debtor(s)) Judge Timothy A. Barnes

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on March 16, 2023, at 9:30am, I will appear before the Honorable Timothy A. Barnes, or any judge sitting in that judge's place, **either** in courtroom 744 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, **or** electronically as described below, and present the motion of Debtor [to/for] Employ Attorney, a copy of which is attached.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government.

You may appear electronically by video or by telephone.

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 161 329 5276, and the passcode is 433658. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

By: David Freydin

Attorney for Debtor
Law Offices of David Freydin
8707 Skokie Blvd, Suite 312
Skokie, Illinois 60077
847.972.6157

CERTIFICATE OF SERVICE

I, David Freydin, certify [if an attorney]/declare under penalty of perjury under the laws of the United States of America [if a non-attorney] that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on February 21, 2023, at 5:00 pm.

/s/ David Freydin

[Signature]

CERTIFICATE OF SERVICE

I hereby certify that in this 21st day of February, 2023, I placed a true and correct copy of the foregoing DEBTORS' MOTION TO EMPLOY ATTORNEY., in the U.S. Mail, first-class, postage prepaid, following parties: addressed to the

Patrick S. Layng
Office of the U.S. Trustee, Region 11
219 S. Dearborn St.
Room 873
Chicago, IL 60604

Marilyn O. Marshall
224 S. Michigan, Ste 800
Chicago, IL 60604

Service List

/s/ David Freydin
David Freydin

Label Matrix for local noticing
0752-1
Case 20-19755
Northern District of Illinois
Eastern Division
Tue Feb 21 09:48:00 CST 2023

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

1st Financial Bank USA
Attn: Bankruptcy
Po Box 1100
North Sioux City, SD 57049-1100

ARS National Services Inc.
P.O. Box 469046
Escondido, CA 92046-9046

(p)AMERICAN HONDA FINANCE
P O BOX 168088
IRVING TX 75016-8088

Bank of America
4909 Savarese Circle
F11-908-01-50
Tampa, FL 33634-2413

Bank of America, N.A.
P O Box 982284
El Paso, TX 79998-2284

Blitt & Gaines PC
775 Corporate Woods
Vernon Hills, IL 60061-3112

Blitt and Gaines
661 Glenn Ave.
Wheeling, IL 60090-6017

Brksb/cbna
Po Box 6497
Sioux Falls, SD 57117-6497

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0285

Cavalry Portfolio Services
500 Summit Lake
Suite 400
Valhalla, NY 10595-2321

Cavalry SPV I, LLC
500 Summit Lake Drive, Ste 400
Valhalla, NY 10595-2321

(p)JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE LA 71203-4774

Citibank
Bankruptcy Department
Po Box 790034
St Louis, MO 63179-0034

Citibank
Citicorp Credit Svcs/Centralized Bk dept
Po Box 790034
St Louis, MO 63179-0034

Citibank, N.A.
5800 S Corporate Pl
Sioux Falls, SD 57108-5027

Comenity Bank
Attn: Bankruptcy
Pob 182125
Columbus, OH 43218-2125

Credit Collection Services
725 Canton St.
Norwood, MA 02062-2679

Credit Control, LLC
PO BOX 546
Hazelwood, MO 63042-0546

ECMC
Attn: Bankruptcy
111 Washington Ave South, Ste 1400
Minneapolis, MN 55401-6800

Harris & Harris
111 West Jackson Blvd Ste 400
Chicago, IL 60604-4135

Hunter Warfield
Attention: Bankruptcy
4620 Woodland Corporate Blvd
Tampa, FL 33614-2415

IRS
P.O. Box 7346
Philadelphia, PA 19101-7346

Kohn Law Firm SC
735 N Water St Suite 1300
Milwaukee, WI 53202-4106

M3 Financial Services
P.O. Box 7230
Westchester, IL 60154-7230

Maureen Mitchell
460 Elder Ln
Winnetka, IL 60093-4251

Midland Funding
Attn: Bankruptcy
350 Camino De La Reine Ste 100
San Diego, CA 92108-3007

Midland Funding, LLC
Midland Credit Management, Inc. as
agent for Midland Funding, LLC
PO Box 2011
Warren, MI 48090-2011

Naviet
Attn: Claims Dept
Po Box 9500
Wilkes-Barr, PA 18773-9500

NorthShore Health
1301 Central Street
Evanston, IL 60201-1613

Quest Diagnostics
P.O. Box 740397
Cincinnati, OH 45274-0397

Synchrony Bank
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896-5060

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Tapestry Glenview
c/o Hunter & Warfield
4620 Woodland Corp. Blvd
Tampa, FL 33614-2415

Toyota Motor Credit
6565 Headquarters Dr,
Plano, TX 75024-5965

Toyota Motor Credit Corporation
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

UCIL Group LLC
PO BOX 351
Glenview, IL 60025-0351

David Freydin
Law Offices of David Freydin Ltd
8707 Skokie Blvd
Suite 312
Skokie, IL 60077-2281

Julia Gekhter
660 Prestwick Lane, Unit 501
Wheeling, IL 60090-6252

Marilyn O Marshall
224 South Michigan Ste 800
Chicago, IL 60604-2503

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

American Honda Finance
Attn: Bankruptcy
Po Box 168088
Irving, TX 75016

(d)American Honda Finance Corporation
National Bankruptcy Center
P.O. Box 168088
Irving, TX 75016-8088

Chase Card Services
Attn: Bankruptcy
Po Box 15298
Wilmington, DE 19850

(d)JPMorgan Chase Bank
P.O. Box 15298
Wilmington, DE 19850

End of Label Matrix
Mailable recipients 42
Bypassed recipients 0
Total 42

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	
)	CASE NO. 20-19755
)	
Julia Gekhter)	HON. Timothy A. Barnes
)	
)	CHAPTER 13
DEBTOR.)	

DEBTOR'S MOTION TO EMPLOY ATTORNEY

NOW COMES Julia Gekhter, Debtor, by and through Debtor's attorney, David Freydin, and moves this Honorable Court to allow Debtor to employ an attorney to prosecute a hardship adversary to discharge her student loans, and in support thereof states as follows:

1. That the Debtor filed a petition for relief pursuant to Chapter 13 Title U.S.C. on November 4, 2020.
2. That this Honorable Court confirmed Debtor's Chapter 13 plan of reorganization on January 7, 2021.
3. That Debtor disclosed her student loans owed to the United States Department of Education on her original petition.
4. That Debtor would like permission to retain David Freydin and the Law Offices of David Freydin to represent her in an adversary proceeding to discharge her student loans under the new guidance issued in November 2022.
5. That David Freydin and his office have considerable experience prosecuting and successfully resolving various types of adversary proceedings.
6. That without counsel, Debtor is not able to properly prosecute a hardship adversary.

7. That pursuant to §327 (e) of the United States Bankruptcy Code, the Debtor respectfully requests that this Honorable Court enter an order authorizing the employment of David Freydin of the Law Offices of David Freydin, an attorney duly authorized to practice law, to perform all legal services necessary to resolve Debtor's student loan adversary matters.
8. That David Freydin or his office will appropriately request and disclose any compensation for adversary proceedings from this Honorable Court.

WHEREFORE, Debtor, prays this Honorable Court for the following relief:

- A. That this Honorable Court authorize Debtor to employ David Freydin of the Law Offices of David Freydin as attorney to perform all legal services necessary or required in the matter of Julia Gekhter.
- B. For such other and further relief this court deems just and proper

Respectfully Submitted,

/s/ David Freydin
Attorney for Debtor
Law Offices of David Freydin
8707 Skokie Blvd, Suite 312
Skokie, IL 60077
847.972.6157